

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

U.S. Securities and Exchange Commission Civ. 1:18-cv-05491-JGK

Plaintiff,

Hon. John G. Koeltl

v.

MOTION TO INTERVENE

Santillo, et al,

Defendants.

Pursuant to Fed. R. Civ. P. 24, and for the reasons stated in the accompanying Memorandum of Law, Movant Doris Olsen hereby moves to intervene in this action for the limited purposes of seeking (1) relief from the Court's June 27, 2018 preliminary injunction order (which freezes Defendants' assets); (2) relief from the Court's August 22, 2019 order modifying the preliminary injunction (so as to allow the transfer of funds from accounts which are subject to Movant's validly obtained judgment lien); and (3) seeking turnover of Defendants' assets in an amount sufficient to satisfy Movant's judgment. In accordance with Rule 24(c), a Complaint for Injunctive Relief is attached as **Exhibit A**.

Respectfully submitted,

MIKA MEYERS PLC
Counsel for Movant

Dated: September 4, 2019

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